

[Your Name]  
[Your Law Firm]  
[Your Address]  
[Your Phone Number]  
[Your Email]

[Date]

[Opposing Counsel Name]  
[Opposing Law Firm]  
[Opposing Counsel Address]

**RE: [Case Name] / [Case Number]**

**SENT VIA EMAIL ONLY**

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer regarding your client's overdue supplemental responses to [Party Name]'s [First/Second] Set of Interrogatories, specifically Interrogatory Nos. [Numbers].

On [Date of Original Response], your client provided initial responses. However, as discussed on [Date of Previous Communication/Call], those responses were incomplete or have since become inaccurate due to [New Evidence/Recent Depositions/Information Disclosure]. Pursuant to [State Local Rule or Federal Rule 26(e)], a party is under a continuing duty to supplement discovery responses when the party learns that the response is incomplete or incorrect.

As of today, we have not received the supplemental verified responses. Given the upcoming [Trial Date/Discovery Cut-off/Deposition Date] on [Date], time is of the essence. We require these supplements to properly prepare our case and avoid prejudice.

Please provide the supplemental responses and responsive documents by [Date/Time]. If we do not receive the supplements by this deadline, we will be forced to seek judicial intervention, including the filing of a Motion to Compel and a request for associated sanctions and fees.

I am available to discuss this matter further via telephone at [Time] today or tomorrow morning. I look forward to your immediate cooperation.

Sincerely,

[Your Signature]  
[Your Printed Name]